

# UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

## CRIMINAL COMPLAINT

V.

M.J. No.: 04-817-MBB

ADAM ELLARD  
WILLIE HESTER  
TAVON ROBINSON  
STEVEN TUCKER  
NORMAN BARNES  
(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about April 12, 2004 in Suffolk County in the District of Massachusetts, defendants did, (Track Statutory Language of Offense)

knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute cocaine base, a Schedule II controlled substance

in violation of Title 21 United States Code, Section 846.

I further state that I am a(n) DEA Special Agent  
Official Title

and that this complaint is based on the following facts:

See Affidavit of DEA Special Agent Steven C. Story attached hereto and incorporated by reference herein

Continued on the attached sheet and made a part hereof: [x] Yes [ ] No

Steven C. Story  
Signature of Complainant  
Steven C. Story  
DEA Special Agent

Sworn to before me and subscribed in my presence,

April 13, 2004 @ 3:05PM at  
Date

Boston, Massachusetts  
City and State

MARIANNE B. BOWLER  
Chief U.S. Magistrate Judge  
Name and Title of Judicial Officer

Marianne B. Bowler, USMJ  
Signature of Judicial Officer